TIVE HEARING COMMISSION COMMISSION COMMISSION
MANUELL
)
) "Mg
j
j
í
j
) Case No.: <u>06-6608241</u> C
)
)
)
j
)
)
)
j
j

# **COMPLAINT**

W. Dale Finke, Director of the Missouri Department of Insurance, for his Complaint against Respondent, Ozell Scott, states as follows:

### INFORMATION RELEVANT TO ALL COUNTS

- 1. Petitioner is the Director of the Missouri Department of Insurance ("the Director"), whose duties include, pursuant to Chapter 374 of the Revised Statutes of Missouri, the regulation, supervision and discipline of bail bond agents.
- 2. Respondent was issued general bail bond agent's license on August 28, 2001 (no.: BB305918), which is currently in active status with an expiration date of August 28, 2007.
- The Commission has jurisdiction of this Complaint pursuant to RSMo § 3. 621.045.

## **COUNT I**

- 4. Respondent has pleaded guilty to a felony, a ground for discipline of respondent's license under RSMo § 374.755.1(2) (Cum. 2005).
  - 5. The facts are as follows:
- a. On or about March 22, 2006, in the Circuit Court of St. Louis
  County, State of Missouri (case no.: 05CR3202), Respondent pleaded guilty to the charge
  of Resisting Arrest pursuant to RSMo § 575.150.
  - b. Such crime is a felony.
- 6. The foregoing action comprises grounds to discipline Respondent's Bail Bond Agent's license under RSMo § 374.755.1(2).

#### **COUNT II**

- 7. Respondent has pleaded guilty to a felony, a ground for discipline of respondent's license under RSMo § 374.755.1(2) (Cum. 2005).
  - 8. The facts are as follows:
- a. On or about March 22, 2006, in the Circuit Court of St. Louis

  County, State of Missouri (case no.: 05CR3202), Respondent pleaded guilty to the charge

  of Unlawful Use of a Weapon pursuant to RSMo § 571.030.1(1).
  - b. Such crime is a felony.
- 9. The foregoing action comprises grounds to discipline Respondent's Bail Bond Agent's license under RSMo § 374.755.1(2).

WHEREFORE, Petitioner respectfully requests this Commission find cause to discipline Respondent's Bail Bond Agent's license.

Respectfully submitted,

Jeremy J. Ray, Esq.

Temporary Missouri Bar # 58/142

Department of Insurance

301 West High Street, Room 530 Jefferson City, Missouri 65101

(573) 751-1924

**ATTORNEY FOR PETITIONER** 

W. Dale Finke, Director

Missouri Department of Insurance